

**IN THE CHANCERY COURT FOR SULLIVAN COUNTY, TENNESSEE  
AT BRISTOL**

**IRENE WELLS,  
LEE McCLINTOCK,  
and  
MILTON BOYD**

**Plaintiffs**

**vs.**

Civil Action No.: **BO024577(M)**

**JUDY DULANEY,  
and  
THE ALDERMAN of THE TOWN OF BLUFF CITY, collectively,  
and  
THE TOWN OF BLUFF CITY, TENNESSEE**

FILED 2/6, 2014 @ 3:49 a.m./p.m.  
By: Katherine Priestner, Clerk & Master  
[Signature]

**Defendants**

**COMPLAINT**

**Introduction:** Plaintiffs are joined together in this action because each of them was the victim of racial discrimination by Defendants. They are African American or at least partially African American. During most of the pertinent time frame they were the only African American employees of the town of Bluff City. The specific discriminatory acts done to each of them will be set out hereinafter. Their causes of action are based on the State and Federal and Common Law prohibitions against racial discrimination and violation of Civil Rights.

They seek injunctive relief as well as damages to cure the violations of the Town Charter.

**IRENE WELLS**

1. At the end of June 2011, Plaintiff Irene Wells was appointed Mayor of the Town of Bluff City by a vote of the aldermen then serving.
2. At a stroke after midnight on July 1, 2011, the new aldermen took office.
3. At some point in time the aldermen had met secretly and decided to do those several things which will hereafter be enumerated in a special or called meeting on July 1, 2011.



1. Plaintiff Boyd was the untitled foreman or supervisor of Bluff City's public works.
2. Judy Delaney destroyed Plaintiff's position by placing another person over him who was white and paying him a lot more than Plaintiff was making and gave him a greater title of Public Works Director.
3. Further, the white supervisor was given an automobile which he could drive home. Plaintiff was never given an automobile.
4. There is no reason for this discrimination other than the fact that Plaintiff was African-American. This situation continues to this date.

Plaintiffs and each of them were embarrassed and humiliated of these acts of racial discrimination and violation of their Civil Rights. They have or will incur attorney's fees and expenses in pursuing this remedy. Plaintiffs McClintock and Boyd lost income or were not paid commensurate with their duties. They are thusly damaged.

WHEREFORE, each plaintiff sues Defendants for \$500,000.00 compensatory damages and the costs of this case. Plaintiffs and each of them sue Defendant Delaney for \$100,000.00 punitive damages. (Neither Plaintiff will accept damages in excess of the town of Bluff City's liability insurance.) Plaintiffs further demand that a mandatory and permanent injunction issue requiring the Town of Bluff City and its Board of Mayor and Alderman to take two of the jobs away from Judy Dulaney to protect the town and thus the taxpayers, and to comply with the Town Charter. And Plaintiffs demand that Defendant Judy Dulaney be enjoined from holding more than one job for the Town of Bluff City, TN. Further, Plaintiffs demand that the Defendants be ordered to provide to Plaintiff Irene Wells the office traditionally provided to the Mayor, and that check signing power be returned to her, and that she be made privy to all of the town's business and to restore all the authority, rights and privileges usually and traditionally held by the Mayor. And Plaintiffs demand the costs of this cause.

Respectfully submitted,



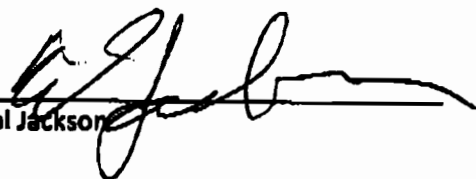
Wendel D. Jackson

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I acknowledge myself surety for the costs of this cause.

  
Wendal Jackson